CDM Federal Programs Corporation

October 25, 1989

TSD

Mr. Dana J. Barnett
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, Pennsylvania 19107

PROJECT: EPA CONTRACT NO. 68-W9-0004
DOCUMENT NO.: TES7-R03002-EP-BHGW
SUBJECT: Work Assignment R03002
Facility Inspection Report
International Paper Company (Liquid Packaging)
Philadelphia, Pennsylvania
Facility I.D. No. PAD 002282002
TES7-R03002-LR-BHGV-02

Dear Mr. Barnett:

Please find enclosed a letter report for the compliance evaluation inspection (CEI) conducted at the referenced facility. This letter report is submitted as partial fulfillment of the reporting requirements for this work assignment.

In summary, a violation of 40 CFR 265.176 was noted during the inspection of the hazardous waste storage pad. The storage pad is shown in the attached photographs. The pad was not located at least 50 feet from the property line. The facility representatives were unaware of the regulation and agreed to move the pad if directed to do so. A follow-up inspection is recommended to ensure compliance.

If you have any questions concerning this letter report, please contact me or Kathryn Garris at (215) 293-0450.

Sincerely,

CDM Federal Programs Corporation

Mark diFeliciantonio
Regional Manager

MdF/dmh

Enclosure

cc: Stephen Kovash, TES VII Contracting Officer (letter only)
Jean Wright, TES VII Project Officer (letter only)
Donald Senovich, CDM Federal Programs Corporation Program Manager

CDM Federal Programs Corporation

October 25, 1989

Mr. Dana J. Barnett
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, Pennsylvania 19107

PROJECT: EPA CONTRACT NO. 68-W9-0004

DOCUMENT NO.: TES7-R03002-EP-BHGT

SUBJECT: Work Assignment R03002
Compliance Evaluation Inspection Letter Report
International Paper Company (Liquid Packaging)
Philadelphia, Pennsylvania
Facility I.D. No. PAD 002282002
TES7-R03002-LR-BHGV

Dear Mr. Barnett:

CDM Federal Programs Corporation (CDM FPC) received Work Assignment R03002 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0004 (TES VII) to conduct compliance evaluation inspections (CEIs) and land disposal restrictions (LDR) inspections at various RCRA facilities in EPA Region III. The purpose of this letter is to present the findings of the CEI conducted on September 22, 1989 by CDM FPC at the International Paper Company (IPC) facility in Philadelphia, Pennsylvania.

The objective of the inspection was to evaluate the facility's compliance with 40 CFR 260-266 and 268 which stipulate required hazardous waste management practices for hazardous waste generators, transporters, and treatment, storage and disposal (TSD) facilities. This inspection entailed providing facility representatives with a brief explanation of the scope of the inspection, obtaining a verbal description of the facility's operating practices, conducting a visual inspection of the facility, and reviewing the facility's records. The inspection was conducted by Kathryn Garris and Susan Van Ostenbridge of CDM FPC. IPC was represented by Jim Chartrand (Plant Manager) and Mario Domingues (Production Services Manager).

Facility Description

IPC manufactures liquid packaging cartons for the local dairy industries. Cartons are cut from rolls of paper, printed, and assembled. Several solvents are utilized in the printing and assembly process. Ethanol, N-propyl acetate, methanol, isopropanol, N-propanol, and heptane comprise the lip abhesive applied to the cartons. Heptane, xylene and ethyl alcohol are the main constituents of the solvent-based ink. Waste abhesive and solvent-based ink are disposed as ignitable waste. The facility also utilizes a water-based ink which is continually reused in the processing. Any waste produced is combined with solvent-based ink and disposed as ignitable waste. Material profile sheets of the solvent and water-based ink are provided in Attachment 1.

International Paper Company is currently classified as a generator of hazardous waste. When the facility filed its Notification of Hazardous Waste Activity in November 1980 and subsequent Part A permit application, the facility indicated it was both a generator and a treatment, storage, and disposal (TSD) facility. The facility has since modified its practices and no longer stores hazardous waste longer than 90 days. The facility re-notified the Pennsylvania Department of Environmental Resources (PA DER) in January 1984 of its intention to delete hazardous waste storage. PA DER acknowledged this change of status in April 1984. Copies of these letters are provided in Attachment 2.

Violations

Upon inspection of the facility hazardous waste storage pad, one violation was noted. This violation is provided below.

- The hazardous waste storage pad is not located at least 15 mile meters (50 feet) from the facility's property line. This is a violation of 40 CFR 265.176.

According to Mario Domingues, the pad is located approximately 18 feet from the facility's property line. Both facility representatives indicated that they were unaware of the regulation and would move the pad if directed to do so. A photograph of the pad is provided in Attachment 3.

No violations were noted during a review of the facility's quarterly reports and manifests for shipments of hazardous waste.

Additional Comments

A pinkish-purple stain was visible within and outside of the hazardous waste storage pad. The stain encompassed an area approximately 5 feet in diameter outside the pad but remained on a paved area. The stain on the hazardous waste storage pad consisted of an area approximately 2x4 feet at the entrance to the pad and was contained by the pad's 8 inch curbing. According to the Mario Domingues, the spill occured one of the days prior to the inspection during a rain storm when cans of the solvent waste were brought out to the pad to be poured in the drums. The representative indicated that the spill would be cleaned up immediately. Photographs of the stained area are provided in Attachment 3.

Enclosed are the CEI checklists completed as part of this inspection. These checklists are provided in Attachment 4. Copies of the field notes are provided in Attachment 5 and the most recent manifests are provided in Attachment 6. If you have any questions concerning this letter report, please contact me or Kathryn Garris at (215) 293-0450.

Sincerely,

CDM Federal Programs Corporation

Bruce R. Pluta
Work Assignment Manager

Enclosures

cc: Stephen Kovash, TES VII Contracting Officer (letter only)
Jean Wright, TES VII Project Officer (letter only)
Donald Senovich, CDM Federal Programs Corporation Program Manager
Mark diFeliciantonio, CDM Federal Programs Corporation Regional Manager

ATTACHMENT 1

MATERIAL PROFILE SHEETS

WASTE PROFILE SHEET

International Paper Co.
Generator Name

Flexographic Printing Waste- Solid

APPROVAL NUMBER GSX/L-0042
DOT SHIPPING NAME Waste, Combustible
DOT HAZARD CLASS Liquid, NOS
UN/NA # NA1993 RQ (EPA Eligible)
US EPA # D001 STATE EPA #
SPECIAL HANDLING 55Gal Steel

Facility Name International Paper Co. **EPA Identification Number:** PA D002282003?
Address 2100 E. Byberry Rd **Contact Name:** Gerald Bernat
City Philadelphia **State** PA **Zip** 19116 **Title:** Manufacturing Engineer **Phone:** (215) 698-4160
Process Generating Waste Flexographic printing process **Frequency** 10-55gal drums/quarte
Physical State at 70°F Solid ☐ Semisolid ☒ Liquid ☐ **Appearance** black **Layers at 70°F** None ☐ Two ☒ Multilayers ☐
Waste Flash Point Exact Flash Point _____ °F, or Ranges < 60°F ☐, 61°F-100°F ☐, 101°F-140°F ☒, 141°F-199°F ☐, > 200°F ☐
Waste Viscosity Low ☐ Medium ☐ High ☒ **Specific Weight** (lb/gal) ? # **Precipitated Solids** _____ %
Waste pH 6-8 **BTU** (lb.) ? # **ASH** (%) ? % **H_2O** (%) 0 % **T.O.H.** (%) 1% (1,1,1) %
Free Cyanide 0 ppm **Free Sulfide** 0 ppm **PCB's** 0 ppm **Dioxin** 0 ppm **Radioactive** Yes ☐ No ☒
Reactivity: Reactive With not reactive **Reactivity Products:** Gas ☐ Heat ☐ Flame ☐ Polymerization ☐

CHEMICAL CONSTITUENTS

various waste inks	= 8 %	ethyl acetate	= 2 %	ethyl alcohol	= 5 %		
glycol ether	= 2 %	propyl alcohol	= 1 %	1,1,1 trichloroethane	= 1 %	heptane	= 60 %
xylene	= 8 %	adhesive	= 13 %		= %		= %

TOTAL METALS (PPM)

As 0	Ag 0	Cd 0	Ba 0	Cr 0	Pb 0	Hg 0	Se 0		
Co 0	Na 0	Mg 0	Ti 0	Mn 0	Sb 0	Ni 0	Zn 0		
Cu 0	Si 0	Fe 0	Cr+3 0	Cr+6 0					

Other Information: Solidified adhesive mixture = adhesive + heptane + xylene 350°°/55
Waste Container Type Drum ☒ Bulk ☐ Other _____ **EPA Waste Code** I **State Waste Code** NJ1993
T23 PA/Penn

I certify to the best of my knowledge and ability that the information provided is accurate, complete and true. In addition this waste is not explosive or biologic.

Gerald A. Bernat 9/19/86
Generator's Signature Date

Information Completed by
NAME G. Bernat
TITLE Manufacturing Engineer
DATE 9/19/86

MATERIAL PROFILE SHEET

APPROVAL NUMBER LCF
DOT SHIPPING NAME Waste, Flammable
DOT HAZARD CLASS Liquid, NOS.
UN/NA # UN1993 RQ
US EPA # D001 STATE EPA #
SPECIAL HANDLING Must be Pumpable

International Paper Co. — Generator Name
Flexographic Printing Waste — Waste Name

Facility Name International Paper Co. **EPA Identification Number:** PAD002282002
Address 2100 E. Byberry Rd. **Contact Name:** Gerald Bernat
City Philadelphia **State** PA **Zip** 19116 **Title:** Manufacturing Engineer **Phone:** (215)698-4160
Process Generating Waste Flexographic Printing Process **Frequency** approx. 400gal/90 days
Physical State at 70°F Solid ☐ Semisolid ☐ Liquid ☒ **Appearance** black **Layers at 70°F** None ☑ Two ☐ Multilayers ☐
Waste Flash Point Exact Flash Point _____ °F, or Ranges < 60°F ☐, 61°F-100°F ☑, 101°F-140°F ☐, 141°F-199°F ☐, > 200°F ☐
Waste Viscosity Low ☐ Medium ☒ High ☐ **Specific Weight** (lb/gal) ? # **Precipitated Solids** 0 %
Waste pH 6-8 **BTU** (lb.) 12000 Btu/gal **ASH** (%) varies % **H_2O** (%) 0 % **T.O.H.** (%) 0 %
Free Cyanide 0 ppm **Free Sulfide** 0 ppm **PCB's** 0 ppm **Dioxin** 0 ppm **Radioactive** Yes ☐ No ☒
Reactivity: Reactive With not reactive **Reactivity Products:** Gas ☐ Heat ☐ Flame ☐ Polymerization ☐

CHEMICAL CONSTITUENTS

ethyl acetate = 5 %	ethyl alcohol = 10 %	propyl alcohol = 5 %	
glycol ether = 1 %	various waste inks = 79 %	_____ = ____ %	_____ = ____ %
_____ = ____ %	_____ = ____ %	_____ = ____ %	_____ = ____ %

TOTAL METALS (PPM)

As 0	Ag 0	Cd 0	Ba 0	Cr 0	Pb 0	Hg 0	Se 0
Co 0	Na 0	Mg 0	Ti 0	Mn 0	Sb 0	Ni 0	Zn 0
Cu 0	Si 0	Fe 0	Cr+3 0	Cr+6 0	—	—	—

Other Information: 130.00/55 Drum 28.00/Drum Trans
Waste Container Type Drum ☐ Bulk ☑ Other _____ **EPA Waste Code** I **State Waste Code** UN1993

I certify to the best of my knowledge and ability that the information provided is accurate, complete and true. In addition this waste is not explosive or biologic.

Gerald A Bernat — Generator's Signature — 9/19/86 — Date

Information Completed by:
NAME G. Bernat
TITLE Manufacturing Engineer
DATE 9/19/86

MATERIAL PROFILE SHEET

APPROVAL NUMBER GSX/L-0042
DOT SHIPPING NAME Waste, Combustible Liquid, NOS
DOT HAZARD CLASS Combustible Liquid
UN/NA # NA1993 RQ (Reportable Quantity)
US EPA # D001 STATE EPA #
SPECIAL HANDLING 55-Steel

International Paper Co — Generator Name

Waste Waterbase Inks. — Waste Name

Facility Name International Paper Co **EPA Identification Number:** PAD002282085.2
Address 2100 E Byberry Rd. **Contact Name:** Gerald Bernat
City Philadelphia **State** PA **Zip** 19116 **Title:** Manufacturing Eng. **Phone:** (215) 698-4160
Process Generating Waste Unused water-based inks **Frequency** 1 time - 8 - 55 gal. drums
Physical State at 70°F Solid ☐ Semisolid ☐ Liquid ☒ **Appearance** ink **Layers at 70°F** None ☒ Two ☐ Multilayers ☐
Waste Flash Point Exact Flash Point _____ °F, or Ranges < 60°F ☐, 61°F-100°F ☐, 101°F-140°F ☒, 141°F-199°F ☐, > 200°F ☐
Waste Viscosity Low ☐ Medium ☐ High ☐ **Specific Weight** (lb/gal) ~8 # **Precipitated Solids** 0 %
Waste pH 8.2 - 8.5 **BTU** (lb.) ~7 # **ASH** (%) ~1 % **H_2O** (%) 83% ROC DISC SPIN % **T.O.H.** (%) 0 %
Free Cyanide 0 ppm **Free Sulfide** 0 ppm **PCB's** 0 ppm **Dioxin** 0 ppm **Radioactive** Yes ☐ No ☒
Reactivity: Reactive With not reactive **Reactivity Products:** Gas ☐ Heat ☐ Flame ☐ Polymerization ☐

CHEMICAL CONSTITUENTS

ethylene glycol monobutyl ether = 60 %	Isopropyl alcohol = 40 %	_____ = ____ %	
_____ = ____ %	_____ = ____ %	_____ = ____ %	_____ = ____ %
_____ = ____ %	_____ = ____ %	_____ = ____ %	_____ = ____ %

TOTAL METALS (PPM)

As 0	Ag 0	Cd 0	Ba 0	Cr 0	Pb 0	Hg 0	Se 0	
B 0	Na 0	Mg 0	Ti 0	Mn 0	Sb 0	Ni 0	Zn 0	
Al 3 mg/L	Si 0	Fe 0	Cr+3 0	Cr+6 0				

Other Information: 350.00/55 + 23.00/Drum Transp

Waste Container Type Drum ☒ Bulk ☐ Other _____ **EPA Waste Code** D _____ **State Waste Code** _____

I certify to the best of my knowledge and ability that the information provided is accurate, complete and true. In addition this waste is not explosive or biologic.

Generator's Signature _____ Date 9/19/96

Information Completed by:
NAME G. Bernat
TITLE Manufacturing Engineer
DATE

ATTACHMENT 2

NOTIFICATION LETTERS

Department of Environmental Resources
1875 New Hope Street
Norristown, PA 19401
215 270-1920

April 20, 1984

Mr. Gil J. Sheerer, Coordinator
Environmental Services
International Paper Company
Suite 100, 6075 The Corners Parkway
Norcross, GA 30092

Re: Liquid Packaging Facility
Identification No. PAD002282002

Dear Mr. Sheerer:

It has been determined by our staff that you are not a TSD facility or that you qualify under the permit by rule provision in our hazardous waste management rules and regulations.

Therefore, you will not have to submit a Part B hazardous waste permit application and we are returning your Part A application if you previously submitted one to the Department.

This means you no longer have interim status as a TSD facility and you may not engage in this type of activity at your facility. You will not be required to secure a hazardous waste management permit for your facility, but you are still subject to any portion of the hazardous waste management rules and regulations published in the Pennsylvania Bulletin September 4, 1982 which pertain to your facility. This includes the submission of a closure plan if you operated as a treatment storage or disposal facility after November 19, 1980.

If you qualify under the permit by rule provision of the regulations then you may continue to operate as a hazardous waste facility in accordance with NPDES or local sewer authority requirements.

This does not release you from Environmental Protection Agency requirements. You will have to contact their Philadelphia Regional Office to verify that you do not have to submit a Part B application to their agency.

If you have any questions concerning this, I can be reached at the above number.

Very truly yours,

LAWRENCE H. LUNEK
Solid Waste Facilities Supervisor

cc: Philadelphia Department of Health
Field Supervisor
Division of Hazardous Waste Management
U.S. EPA Code 3AW32 ✓
Re 30 B(5)

INTERNATIONAL PAPER COMPANY

INTERNATIONAL PAPER PLAZA
77 WEST 45TH STREET, NEW YORK, NEW YORK 10036

ONSUMER PACKAGING GROUP

LEN A. DELL
ce President & Group Executive

PHONE (212) 536-6036

January 20, 1984

Mr. Stephen R. Wassersug, Director
Air and Water Management Division
U.S. Environmental Protection Agency
Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

Re: International Paper Company
Liquid Packaging Facility
Philadelphia, Pennsylvania
EPA ID No. PAD002282002

Dear Mr. Wassersug:

In response to your letter dated December 15, 1983, International Paper Company wishes to withdraw hazardous waste TSD facility status for the subject facility. As explained in our May 23, 1983 letter to your agency, this facility does not store its hazardous waste on-site for 90 days or more. Therefore, we will not submit Part B of the application for a RCRA permit for this facility. As we indicated in our May 23 letter, however, we wish to retain generator status and the EPA ID number for the facility.

Should you need additional information please contact Gil Sheerer in our Regional Environmental Services Office (404/447-1474).

Very truly yours,

Glen A. Dell

/jry
cc: Gary Galida
Wayne L. Lynn

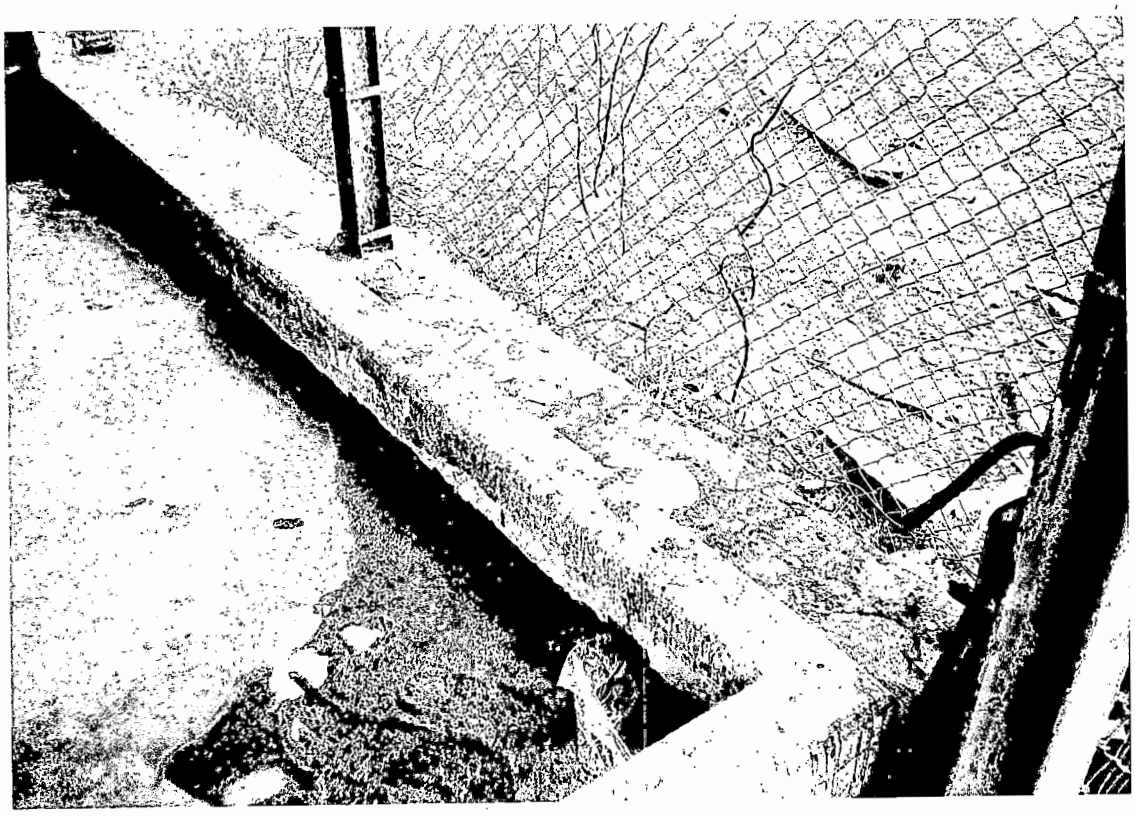
RECEIVED
Facilities Management Section
JAN 25 1984
U.S. EPA, Region III

Coded 33/NF
1/26/84

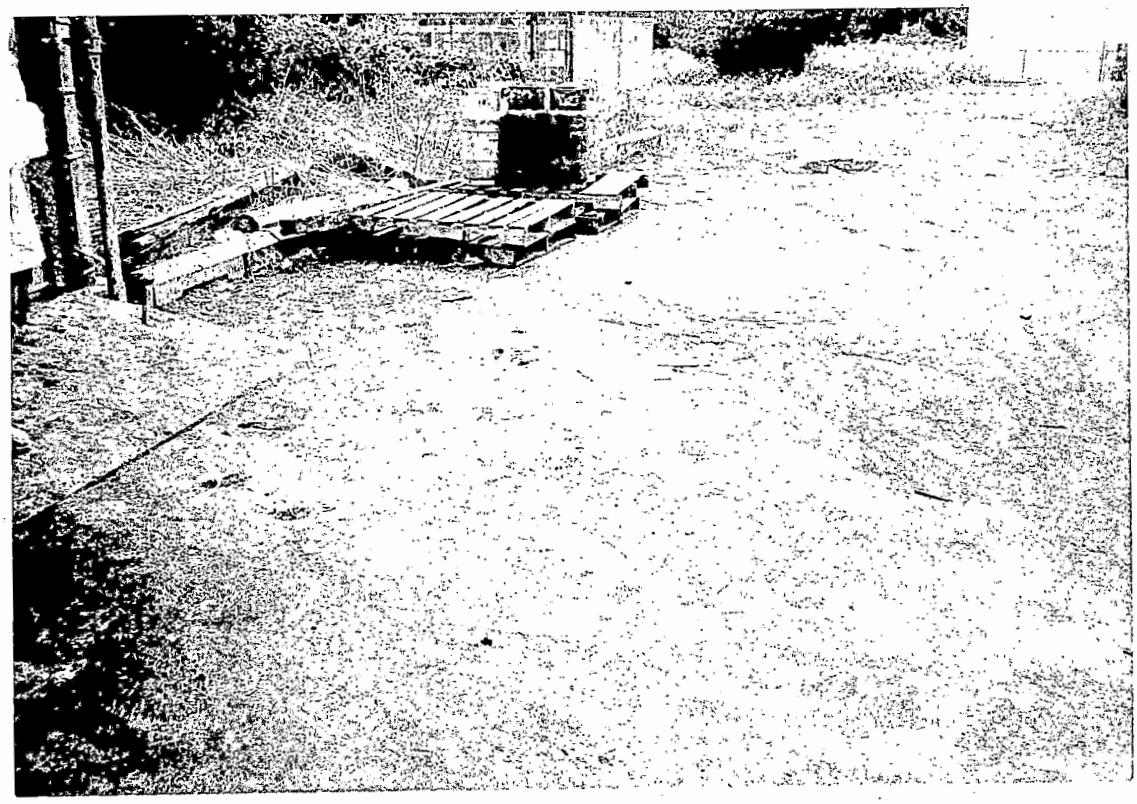
ATTACHMENT 3

PHOTOGRAPHS

Photograph 1: Hazardous Waste Storage Area



Photograph 2: Stains inside the Hazardous Waste Storage Pad



Photograph 3: Stained paved area outside of Hazardous Waste Storage Area

ATTACHMENT 4

CEI CHECKLISTS

IPC

EXHIBIT IV-1

GENERAL SITE INSPECTION INFORMATION FORM

A. Site Name	B. Street (or other identifier)
International Paper Co	2100 Byberry Road

C. City	D. State	E. Zip Code	F. County Name
Philadelphia	PA	19116	Phila.

G. Site Operator Information

1. Name International Paper Co
2. Telephone Number (215) 536-7008
3. Street 77 West 45th Street
4. City NY
5. State NY
6. Zip Code 10036

H. Site Description
Active facility that manufactures liquid pack

I. Type of Ownership

__1. Federal __2. State __3. County __4. Municipal ✓5. Private

J.

✓1. Generator __2. Transporter __3. Treatment __4. Storage __5. Disposal

K. Regulatory Status

__1. Interim Status __3. Part B Permit Application Submitted

__2. Permitted Facility __4. Part B Permit Application in Preparation

L.

1. Principal Inspector Name Kathryn Garris
2. Title Env. Scientist
3. Organization CDM FPC
4. Telephone No. (area code and No.) (215) 293-0450

M. Inspection Participants

1. Sue Van Ostenbridge	6.
2.	7.
3.	8.
4.	9.
5.	10.

EXHIBIT IV-2 IPC

GENERAL FACILITY CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? ✓Yes __No

   a. If yes, EPA I.D. No. PAD002282002
   If no, explain. _____

2. Has facility received hazardous waste from a foreign source? __Yes ✓No

   a. If yes, has it filed a notice with the Regional Administrator? __Yes __No

Waste Analysis

3. Does facility maintain a copy of the waste analysis plan at the facility? __Yes ✓No

   a. If yes, does it include:

      1. Parameters for which each waste will be analyzed? __Yes __No
      2. Test methods used to test for these parameters? __Yes __No
      3. Sampling method used to obtain sample? __Yes __No
      4. Frequency with which the initial analyses will be reviewed or repeated? __Yes __No
      5. (For offsite facilities) waste analyses that generators have agreed to supply? __Yes __No
      6. (For offsite facilities) procedures which are used to inspect and analyze each movement of hazardous waste, including:

         a. Procedures to be used to determine the identity of each movement of waste. __Yes __No
         b. Sampling method to be used to obtain representative sample of the waste to be identified. __Yes __No

4. Does the facility provide adequate security through:

   a. 24-hour surveillance system (e.g., television monitoring or guards)? ✓Yes __No

   OR

(continued)

b. 1. Artificial or natural barrier around facility (e.g., fence or fence and cliff)? ___Yes ✓No

Describe _____

AND

2. Means to control entry through entrances (e.g., attendant, television monitors, locked entrance, controlled roadway access)? ✓Yes ___No

Describe Controlled entrance

General Inspection Requirements

5. Does the owner/operator maintain a written schedule at the facility for inspecting:

a. Monitoring equipment? ___Yes ___No N/A
b. Safety and emergency equipment? fire extinguishers ✓Yes ___No
c. Security devices: ADT inspects ✓Yes ___No
d. Operating and structural equipment? ___Yes ___No N/A
e. Types of problems of equipment:

1. Malfunction ___Yes ___No
2. Operator error ___Yes ___No
3. Discharges ___Yes ___No

6. Does the owner/operator maintain an inspection log? ___Yes ___No
H W Storage area

a. If yes, does it include:

1. Date and time of inspection? ✓Yes ___No
2. Name of inspector? ✓Yes ___No
3. Notation of observations? ✓Yes ___No
4. Date and nature of repairs or remedial action? ✓Yes ___No

b. Are there any malfunctions or other deficiencies not corrected? (Use narrative explanation sheet.) ___Yes ✓No

Personnel Training

7. Does the owner/operator maintain personnel training records at the facility? ✓Yes ___No

(continued)

How long are they kept? forever permanently

a. If yes, do they include:

1. Job title and written job description of each position? ___Yes ✓No
2. Description of type and amount of training? typically ✓Yes ___No
3. Records of training given to facility personnel? ✓Yes ___No

Requirements for Ignitable, Reactive, or Incompatible Waste

8. Does facility handle ignitable or reactive wastes? ✓Yes ___No

a. If yes, is waste separated and confined from sources of ignition or reaction (open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat? yes fenced area, locked, paved + bermed

1. If yes, use narrative explanation sheet to describe separation and confinement procedures.
2. If no, use narrative explanation sheet to describe sources of ignition or reaction.

b. Are smoking and open flame confined to specifically designated locations? ✓Yes ___No

c. Are "No Smoking" signs posted in hazardous areas? ✓Yes ___No

d. Are precautions documented (Part 264 only)? ___Yes ✓No

9. Check containers

a. Are containers leaking or corroding? ___Yes ✓No

b. Is there evidence of heat generation from incompatible wastes? ___Yes ✓No

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion, or contamination of the environment? ___Yes ✓No

If yes, use narrative explanation sheet to explain.

(continued)

EXHIBIT IV-2 (continued)

2. Is the facility equipped with:

   a. Internal communication or alarm system? ✓Yes __No

      1. Is it easily accessible in case of emergency? ✓Yes __No

   b. Telephone or two-way radio to call emergency response personnel? ✓Yes __No

   c. Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? ✓Yes __No

   d. Water of adequate volume for hoses, sprinklers, or water spray system? ✓Yes __No

      1. Describe source of water Philo

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? ✓Yes __No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) ✓Yes __No

5. In the case that more than one police or fire department might respond, is there a designated primary authority? ✓Yes __No

   a. If yes, name primary authority Philo

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? ✓Yes __No

   a. Are they readily available to all personnel? ✓Yes __No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? ✓Yes __No

8. If State or local authorities decline to enter, is this entered in the operating record? ✓Yes __No

(continued)

EXHIBIT IV-2 (continued)

Section C - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility? ✓Yes __No

   a. If yes, is it a revised SPCC Plan? __Yes ✓No

   b. Does contingency plan include:

      1. Arrangements with local emergency response organizations? ✓Yes __No
      2. Emergency coordinators' names, phone numbers, and addresses? ✓Yes __No
      3. List of all emergency equipment at facility and descriptions of equipment? ✓Yes __No
      4. Evacuation plan for facility personnel? ✓Yes __No

2. Is there an emergency coordinator on site or on call at all times? told police verbally - all emergency people on call - Name #s are provided __Yes ✓No

Section D - Manifest System, Recordkeeping, and Reporting

1. Does facility receive waste from offsite? __Yes ✓No

   a. If yes, does the owner/operator retain copies of all manifests? __Yes __No

      1. Are the manifests signed and dated and returned to the generator? __Yes __No
      2. Is a signed copy given to the transporter? __Yes __No

2. Does the facility receive any waste from a rail or water (bulk shipment) transporter? __Yes ✓No

   a. If yes, is it accompanied by a shipping paper? __Yes __No

      1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? __Yes __No
      2. Is a signed copy given to the transporter? __Yes __No

3. Has the owner/operator received any shipments of waste that were inconsistent with the manifest (manifest discrepancies)? __Yes __No N/A

   a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? __Yes __No

      1. If no, has Regional Administrator been notified? __Yes __No

(continued)

EXHIBIT IV-2 (continued)

4. Does the owner/operator keep a written operating record at the facility? __Yes __No N/A

   a. If yes, does it include:

      1. Description and quantity of each hazardous waste received? __Yes __No
      2. Methods and dates of treatment, storage, and disposal? __Yes __No
      3. Location and quantity of each hazardous waste at each location? __Yes __No
      4. Cross-references to manifests/shipping papers? __Yes __No
      5. Records and results of waste analyses? __Yes __No
      6. Report of incidents involving implementation of the contingency plan? __Yes __No
      7. Records and results of required inspections? __Yes __No
      8. Monitoring or testing analytical data (Part 264)? __Yes __No
      9. Closure cost estimates and, for disposal facilities, post-closure cost estimates (Part 264)? __Yes __No
      10. Notices of generators as specified in §264.12(b) (Part 264)? __Yes __No

5. Does the facility submit a biennial report by March 1 every even-numbered year? __Yes __No N/A

   a. If yes, do reports contain the following information:

      1. EPA I.D. number? __Yes __No
      2. Date and year covered by report? __Yes __No
      3. Description/quantity of hazardous waste? __Yes __No
      4. Treatment, storage, and disposal methods? __Yes __No
      5. Monitoring data under §265.94(a)(2) and (b)(2) (Part 265)? __Yes __No
      6. Most recent closure and post-closure cost estimates? __Yes __No
      7. For TSD generators, description of efforts to reduce volume/toxicity of waste generated, and actual comparisons with previous year? __Yes __No
      8. Certification signed by owner/operator? __Yes __No

6. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? __Yes __No N/A

   a. If yes, has he submitted an unmanifested waste report to the Regional Administrator? __Yes __No

7. Does the facility submit to the Regional Administrator reports on releases, fires, and explosions; contamination and monitoring data; and facility closure? __Yes __No N/A

EXHIBIT IV-4 IPC

GENERATOR'S CHECKLIST

Section A - EPA Identification No.

1. Does generator have EPA I.D. No? ✓ Yes __ No

   a. If yes, EPA I.D. No. P A D 0 0 2 2 8 2 0 0 2

Section B - Manifest

1. Does generator ship waste offsite? ✓ Yes __ No

   a. If no, do not fill out Sections B and D.

   b. If yes, identify primary offsite facility(s). Use narrative explanation sheet.

2. Does generator use manifest? ✓ Yes __ No

   a. If no, is generator a small quantity generator (generating between 100 and 1000 kg/month)? __ Yes __ No

      1. If yes, does generator indicate this when sending waste to a TSD facility? __ Yes __ No

   b. If yes, does manifest include the following information?

      1. Manifest document No. ✓ Yes __ No

      2. Generator's name, mailing address, telephone No. ✓ Yes __ No

      3. Generator EPA I.D. No. ✓ Yes __ No

      4. Transporter Name(s) and EPA I.D. No.(s) ✓ Yes __ No

      5. a. Facility name, address, and EPA I.D. No. ✓ Yes __ No
         b. Alternate facility name, address, and EPA I.D. No. __ Yes ✓ No
         c. Instructions to return to generator if undeliverable __ Yes ✓ No

      6. Waste information required by DOE - shipping name, quantity (weight or vol.), containers (type and number) __ Yes __ No

(continued)

7. Emergency information (optional) (special handling instructions, telephone No.) — __Yes __No

8. Is the following certification on each manifest form? — __Yes __No

   This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

9. Does generator retain copies of manifests? — ✓Yes __No

If yes, complete a through e.

a. 1. Did generator sign and date all manifests? — __Yes __No
   2. Who signed for generator?

   Name James Chartrand Title Plant Manager

b. 1. Did generator obtain handwritten signature and date of acceptance from initial transporter? — __Yes __No
   2. Who signed and dated for transporter?

   Name Various Title _____

c. Does generator retain one copy of manifest signed by generator and transporter? — ✓Yes __No

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? — ✓Yes __No

e. Does generator retain copies for 3 years? on ton — ✓Yes __No

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? — __Yes ✓No

   a. If yes, list waste and quantities (include EPA Hazardous Waste No.) _____

(continued)

EXHIBIT IV-4 (continued)

2. Does generator generate solid waste(s) listed in Subpart C that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) ✓Yes __No

   a. If yes, list wastes and quantities D001 - (include EPA Hazardous Waste No.)

   b. Does generator determine characteristics by testing or by applying knowledge of processes? applied knowledge

      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? __Yes __No

         a. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes generated by generators? __Yes ✓No

   a. If yes, did generator test all wastes to determine nonhazardous characteristics? __Yes __No

      1. If no, list wastes and quantities deemed nonhazardous or processes from which nonhazardous waste was produced (use additional sheet if necessary).

Section D - Pretransport Requirements

1. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? ✓Yes __No

2. a. Are containers to be shipped leaking or corroding? __Yes ✓No

   b. Use sheet to describe containers and condition. N/A

   c. Is there evidence of heat generation from incompatible wastes in the containers? __Yes ✓No

3. Does generator follow DOT labeling requirements in accordance with 49 CFR 172? ✓Yes __No

4. Does generator mark each package in accordance with 49 CFR 172? ✓Yes __No

(continued)

EXHIBIT IV-4 (continued)

5. Is each container of 110 gallons or less marked with the following label? ✓Yes __No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest policy or public safety authority or the U.S. Environmental Protection Agency.

Generator name(s) and address(es) _____

_____

Manifest document No. _____ _____

6. Does generator have placards to offer to transporters? __Yes ✓No
transporters have their own

7. Accumulation time

a. Are containers used to temporarily store waste before transport? ✓Yes __No

1. If yes, is each container clearly dated: Also, fill out rest of No. 7 (accum. time) ✓Yes __No

b. 1. Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) ✓Yes __No

2. If yes, with what frequency? Manager of Production Maintenance Sup usually inspects ~ 1 month - only 2 inspections for 89. Janitor unofficially inspects daily

c. Does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) from the facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) __Yes ✓No
doesn't look like it

NOTE: If tanks are used, fill out checklist for tanks. Tank not used since as-tank not labeled

d. Are the containers labeled and marked in accordance with Section D-3, -4, and -5 of this form? __Yes __No N/A
not presently used

NOTE: If generator accumulates waste on site, fill out checklist for General Facilities, Subparts C and D.

e. Does generator comply with requirements for personnel training? (Attach checklist for 265.16 - Personnel Training.) ✓Yes __No

8. Describe storage area. Use photos and narrative explanation sheet.

(continued)

EXHIBIT IV-4 (continued)

Section E - Recordkeeping and Records

1. Does generator keep the following reports for 3 years?

a.	Manifests and signed copies from designated facilities	✓ Yes __ No
b.	Annual reports quarterly	__ Yes __ No
c.	Exception reports	__ Yes __ No N/A
d.	Test results	__ Yes __ No N/A

2. Where are the records kept (at facility or elsewhere)? at facility

3. Who is in charge of keeping the records?

Name Jim Chartrand Title Plant Manager

Section F - Special Conditions

1. Has generator received from or transported to a foreign source any hazardous waste? __ Yes ✓ No

a.	If yes, has he filed a notice with the Regional Administrator?	__ Yes __ No
b.	Is this waste manifested and signed by a foreign cosignee?	__ Yes __ No
c.	If generator transported wastes out of the country, has he received confirmation of delivered shipment?	__ Yes __ No

IPC

EXHIBIT IV-6

CONTAINERS CHECKLIST

Section A - Use and Management

1. Are containers in good condition? ✓Yes __No

Section B - Compatibility of Waste With Container

1. Is container made of a material that will not react with the waste which it stores? ✓Yes __No

Section C - Management of Containers

1. Is container always closed while holding hazardous waste? ✓Yes __No

2. Is container handled so that it will not be opened, handled, or stored in a manner which may rupture it or cause it to leak? __Yes __No
Spill in area of Hazardous waste storage area + outside of it indicates a drum may have been ruptured while storing

Section D - Inspections

1. Does owner/operator inspect containers at least weekly for leaks and deterioration? ✓Yes __No
but not written record

Section E - Containment (Part 264)

1. Do container storage areas have a containment system? ✓Yes __No

Section F - Ignitable and Reactive Waste

1. Are containers holding ignitable and reactive waste located at least 15 m (50 ft) from facility property lines? __Yes ✓No

Section G - Incompatible Waste

1. Are incompatible wastes or materials placed in the same containers? __Yes ✓No

2. Are hazardous wastes placed in washed, clean containers when they previously held incompatible waste? __Yes ✓No
only generate 1 drum waste - D001

(continued)

EXHIBIT IV-6 (continued)

3. Are incompatible hazardous wastes separated from each other by a berm, dike, wall, or other device? __Yes __No N/A

Section H - Closure (Part 264)

1. At closure, were all hazardous wastes and associated residues removed from the containment system? __Yes __No N/A

IPC

EXHIBIT IV-3

LAND DISPOSAL RESTRICTIONS CHECKLIST

1. Are hazardous wastes land-disposed on site? ("Land disposal" includes placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, concrete vault, or bunker intended for disposal purposes; and placement in or on the land by means of open detonation and open burning where residues continue to exhibit hazardous characteristics). __Yes ✓No

   a. If yes, are one or more of the following circumstances true:

      1. Granted extension from effective date pursuant to §268.5? __Yes __No
      2. Granted exemption from a prohibition pursuant to a petition under §268.6? __Yes __No
      3. Disposing of soil or debris resulting from a CERCLA response action or a RCRA corrective action, which will not be prohibited until November 8, 1988? __Yes __No
      4. Facility is a small quantity generator of less than 100 kg of hazardous waste per month? __Yes __No

2. Are restricted wastes or residuals from treatment of a restricted waste diluted in any way prior to disposal? __Yes __No

3. Are there active surface impoundments used for treatment of hazardous wastes? __Yes ✓No

   a. If yes, does the unit's design and operation meet the requirements set forth in §268.4? __Yes __No

4. Has the facility sought exemption from any prohibition under Subpart C of §268 for the disposal of a restricted hazardous waste? __Yes __No

   a. If yes, has the facility's demonstration included the required components (waste I.D., waste analysis, comprehensive environmental characterization of unit site, QA/QC plan, sampling, testing, modeling)? __Yes __No

5. Has the facility determined whether it generates a restricted waste through waste analysis? __Yes ✓No

   a. If yes, is the facility, in fact, handling a restricted waste(s)? __Yes __No

(continued)

b. If yes, does the restricted waste require treatment? __Yes __No

c. If yes, has the generator notified the treatment facility in writing, and does the notification include all required components (EPA hazardous waste number, corresponding treatment standard, manifest number of shipment)? __Yes __No

6. Does the facility handle EPA Hazardous Waste Nos. F001 through F005 (solvent wastes)? not recently - old chem removed __Yes ✓No

a. If yes, do any of the following conditions apply:

1. The generator of the solvent waste is a small quantity generator (not more than 1000 kg/month)? __Yes __No
2. The solvent waste is generated from a CERCLA response corrective action? __Yes __No
3. The solvent waste is a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001 through F005 solvent constituents. __Yes __No

b. If no, have any of these restricted wastes been land-disposed (except in an injection well) since November 8, 1986? __Yes __No N/A

7. Does the facility handle EPA Hazardous Waste Nos. F020, F021, F023, F026, F027, or F028 (dioxin-containing wastes)? __Yes ✓No

a. If yes, do any of the following conditions apply:

1. Wastes are treated to meet standards of Subpart D of §268? __Yes __No
2. Wastes are disposed of at a facility that has been granted a petition? __Yes __No
3. An extension has been granted? __Yes __No

b. If no, will these restricted wastes be land disposed after November 8, 1988? __Yes __No N/A

8. Are restricted wastes being treated? __Yes __No

a. If yes, have any of their associated hazardous constituents exceeded the "Constituent in Waste Extract" (CWE) levels? __Yes __No

ATTACHMENT 5

FIELD NOTES

F005 waste - unused chemicals

Left site 6:00

9/21/89 Kathy Davis

4/22/89 Onternational Paper

1300 Arrived on site
weather is warm, humid
+ periodically raining ~ 80°F

COM FPC present:
Kathy Davis
Susan Van Ostenbridge

Ostin Paper Present
Jim Chartrand - Plant Manager
Mario Dominguez - Industrial Hygienist
Jim Pomeroy

Talked about facility &
reps - asked for map

1330 Started inspection in
Manufacturing area

Huge rolls of paper are
cut into cartons

Machine that applies abrasive is called Rubber - cans placed beneath machine collect solvent waste - Cans not labeled as H.w

At the Painting operation - open cans of wet material paint - water base paint

When cans are taken away from press - cans are closed & waste is sent to storage

Went in the water base paint ink storage area - OK

Main area has 3 basic machines - each made different size cartons

Went to solvent based ink room

- 55 gal drum of D001 - labeled H.w. dated 9/19/89

drum of water based press fountain

Went in storage area for pressroom detergent

Went to H.w Storage area - contained by concrete floor & curbing - locked fence shelters

- No sign states H.w Storage area - signs posted states flammables & authorize personnel only

doesn't look OK for any property line - up is Freeway

7 55 gal drums - containing D001 waste - one lid looks rusty - doesn't look securely closed - no ring around it - Dee Dresley rep. lid was opened while there they put back on

drums are pouring - earliest date is 1/14/84

1 1000 gal tank - empty since 4th Quarter 87. Dee Rep said manpower change too expensive - may try using again in future if feasible.

May have to go through closure if no longer used - facility is checking

Sue is taking pictures of stains in & around pad

Evidence of a spill inside the enclosure. outside - looks like people paint/ink - spill encompasses an approximate 5' diam area outside enclosure - on concrete area only - none on unpaved area

No spill absorbent material present

Dee Rep. - spill occurred recently during one of the rainstorms - wasn't sure exactly how it happened -
cans of the solvent are brought out to area & poured into drums there.

- Rep indicated spill would be cleaned immediately

Went back into building

- Went in Plate room - OK

There is a H.W. storage area of Press Room (Big Mann Room)
- posted H.W. sign - no cans in that area at that time

Went in Roll Paper Storage Area then Finished Products storage area - OK

Went into Lab
old ink lab - now used for QC - OK

Went back to [illegible] office
to go over paperwork

from Contingency Plan
Fig. [illegible]
ethanol, n-Propyl Acetate
Methane, Isopropanol,
n-propanol, Heptane

Inspect Report for H.W. Storage area - usually done monthly by supervisor - for 89 only 2 inspections recorded 2/15/89 & 4/15/89 - Due reg. area to [illegible] inspected ~~weekly~~ daily by [illegible]

[illegible]

H.W. Storage Area - ~~must~~ may be 50 ft - from boundary - built in 1980 - reg may not have been in effect then

Doing the manifests
Solvent ink may actually
be F waste -

16:15 Left Site

9/26 Virginia Tube Corp
Arrived on site 9:55

Wet treatment Area - sludge is
removed -
Hw Storage Area
III, TCEA
Napthol in tank
D001,

K062 waste changed to D007 -
Quenching acid sludge - generated
from wire treatment - also because
sometimes contains Cr

supplies parts to various
industries
make blank for AT spark plugs
make studs for Nabu
conducting for Commodore
make parts for electronic organs
work with various 60%
stainless steel, nickel alloys - also
deals with Al, gold, Platinum, silver, bronze, Copper

Attachment to Logbook
9/22/89 - Photo Log for International Paper

1442 - Picture of Haz Waste Storage area

1445 Close up of purple stain inside Haz waste pad

1447 Picture of purple stain outside pad on ramp to pad & other paved area

Kathy Gamis

[illegible] bronze
metals used Al, gold, platinum, silver, copper

[illegible] Union Tube Inc

ATTACHMENT 6

RECENT MANIFESTS

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P. O. Box 8550
Harrisburg, PA 17105-8550

2-139-01

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS AND CHEMOTHERAPEUTIC WASTE.

Form approved.
OMB No. 2050-0039
Expires 9-30-91

ER-SWM-51: REV. 12/88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: PAD 002282002
Manifest Document No.: 74175
2. Page 1 of 1
Information in the shaded areas is not required by Federal law but is required by State law.

3. Generator's Name and Mailing Address
INTERNATIONAL PAPER CO
2100 E BYBERRY RD
PHILADELPHIA PA 19116-3070
4. Generator's Phone (215 698-4150)

A. State Manifest Document Number: PAC 0243902
B. Sate Gen. ID:

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. US EPA ID Number: ILD 051060403
C. State Trans. ID: 9172
PA-AH
D. Transporter's Phone (215 736-8699)

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Trans. ID:
PA-AH
F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
SAFETY-KLEEN CORP.
77 CANAL RD
FAIRLESS HILLS PA 19030
10. US EPA ID Number: PAD 987266715
G. State Facility's ID: 2-139-01
H. Facility's Phone (215 736-8699)

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE PETROLEUM NAPHTHA COMBUSTIBLE LIQUID UN1255 (EPA D001)	001	DM	00045	P	D001
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code)

	Lab Pack	Physical State		Lab Pack	Physical State
a.		L	c.		
b.			d.		

K. Handling Codes for Wastes Listed Above

a.	302	c.	
b.		d.	

15. Special Handling Instructions and Additional Information: 8938 09105354 674175 2-139-01-6121 49

FOR RECYCLE

SKDOT# A: 501 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
MARIO DOMINGUES	For Jim Montanelli	09	19	89

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
WILLIAM F. SCHIAVO JR.		09	19	89

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
LOUISE DEFONTENY	Louise DeFonteny	9	19	89

PAC 0243902

Form 8700-22 (Rev. 9/88)

HAZARDOUS WASTE MANIFEST

Department of the Environment — Hazardous Waste Program
Hazardous & Solid Waste Management Administration
2500 Broening Highway — Baltimore, MD 21224
cc: IPP

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039 Expires 9/30/91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. MD0022820021 — Manifest Document No. 07 — 2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Mario Domingas
215/698-4160
International Paper
2100 East Byberry Road
Philadelphia, PA 19116

4. Generator's Phone ( )

A. State Manifest Document Number: MDC 023657
B. State Generator's ID:
C. State Transporter's ID: 015 — HWH — DC — (301) 953-9583
D. Transporter's Phone:

5. Transporter 1 Company Name: GSX Services, Inc.
6. US EPA ID Number: MDD980554653

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID: HWH — DC
F. Transporter's Phone:

9. Designated Facility Name and Site Address
GSX Services, Inc.
9527 Whiskey Bottom Rd.
Laurel, MD 20707
10. US EPA ID Number: MDD980554653
G. State Facility ID: 1207
H. Facility's Phone: 301-953-9583

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. HM RQ	Waste, Flammable Liquid, N.O.S., (RQ-D001) Flammable Liquid, UN1993 (ethyl acetate and ethanol)	004	DM	00800	P	D001
b. RQ	Waste, Combustible Liquid, N.O.S., Combustible Liquid, NA1993 (xylene and heptane) (RQ-EPA Ignitable)	007	DM	02800	P	D001
c. RQ	Waste, Combustible Liquid, N.O.S., Combustible Liquid, NA1993 (isopropyl alcohol) (RQ-EPA Ignitable)	005	DM	02000	P	D001
d.	— End of Manifest —					

J. Additional Descriptions for Materials Listed Above

	Haz. Code	Physical State	Specific Gravity	Percentage
a.	I	L	1.20	100
b.	I	L	1.35	100
c.	I	L	1.55	100
d.				

K. Handling Codes for Wastes Listed Above: a. 4 c. 4

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Maryland Statutes or Regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: DENNIS Hughes — Signature: Dennis Hughes — Month 9 Day 14 Year 89

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Wayne D. Toth — Signature: Wayne D. Toth — Date: Month 09 Day 14 Year 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Date

MDC 023657

CUSTOMER NOTIFICATION AND CERTIFICATION

ONLY STATEMENTS WITH ORIGINAL SIGNATURES WILL BE ACCEPTED!

Generator Name/Location: International Paper Philadelphia, PA

EPA ID Number: PAD 002282002

Waste Profile or ARF Number: _____

Manifest Number: MDC 0237657/01072

EPA Hazardous Waste Number(s): (_____) (_____)

Waste Analysis Available? Yes _____ No _____ If yes, please attach copy.

X Unrestricted Waste Notification (Category 1)

I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste is not restricted as specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d).

_____ Restricted Waste Notification (Category 2)

I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 40 CFR 268, Subpart D.

—(2A) Waste must be treated by the appropriate regulatory treatment standard or in such a manner which renders it non-liquid by chemical fixation or solidification prior to land disposal. Corresponding treatment standard _____

—(2B) Waste is subject to 40 CFR 268.7(a)(4) and landfilling or placing in a surface impoundment is not allowed unless conditions of category 5 below are met.

_____ Restricted Waste Variance Certification/Notification (Category 3)

I notify pursuant to 40 CFR 268.7(a)(3) and certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268, Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Applicable Variance: _____

_____ Treated Waste Certification (Category 4)

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268, Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

_____ Soft Hammer Waste Certification (Category 5)

—(5A) I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalities for submitting false information, including the possibility of fine or imprisonment.

—(5B) I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

—(5C) I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

_____ Restricted Waste Notification (Category 6)

I notify that I have personally examined and am familiar with the waste through anaylsis and testing or through knowledge of the waste to support this notification that the waste does comply with the treatment standards specified in 40 CFR 268, Subpart D.

SIGNATURE: Dennis H. Lee DATE: 9/14/89

PRINT NAME: DENNIS H. LEE

Generator Name/Location: International Paper Philadelphia, PA

EPA ID Number: PAD 002282002 **Manifest Number:** MDC [redacted] 0237657/01072

Drum Number, Waste Profile or ARF Number	Category No.	State EPA Waste Number(s)	Corresponding Treatment Standard/ Applicable Variance/Other Information
189-LRIPP-01,02	1	D001	
03-09	1	D001	
10-14	1	D001	

SIGNATURE: Dennis Hughes **DATE:** 9/14/89

PRINT NAME: Dennis O Hughes **TITLE:** Production Manager

ONLY ORIGINAL SIGNATURES WILL BE ACCEPTED!

September 23, 1988

For Treatment Standards Expressed as Concentration, Please Enter the Legend Number from the Legend Below for the Constituents contained in the Waste.

LEGEND FOR TREATMENT STANDARDS EXPRESSED AS CONCENTRATION

ABLE CCWE-CONSTITUENTS IN WASTE EXTRACT

F001-F005 spent solvent		Concentration (in mg/1) Waste Water Containing Spent Solvents	Concentration (in mg/1) All other Spent Solvent Wastes
Legend #	Constituent Name		
1	Acetone	0.05	0.59
2	n-butyl alcohol	5.0	5.0
3	Carbon disulfide	1.05	4.81
4	Carbon tetrachloride	.05	.96
5	Chlorobenzene	.15	.05
6	Cresols (and cresylic acid)	2.82	.75
7	Cyclohexanone	.125	.75
8	1.2-dichlorobenzene	.65	.125
9	Ethyl acetate	.05	.75
10	Ethyl benezene	.05	.053
11	Ethyl ether	.05	.75
12	Isobutanol	5.0	5.0
13	Methanol	.25	.75
14	Methylene chloride	.20	.96
15	Methylene chloride (from the pharmaceutical industry)	0.44	.96
16	Methyl ethyl ketone	0.05	0.75
17	Methyl isobuty ketone	0.05	0.33
18	Nitrobenzene	0.66	0.125
19	Pyridine	1.12	0.33
20	Tetrachloroethylene	0.079	0.05
21	Toluene	1.12	0.33
22	1.1.1.-Trichloroethane	1.05	0.41
23	1.2.2.-richloro-1.2.2-trifluroethane	1.05	0.96
24	Trichloroethylene	0.062	0.091

F020-F023 and F026-F028 dioxin Containing Waste		Concentration
Legend #	Constituent Name	
27	HxCCD-All Hexachlorodibenzo-p-dioxins	1 ppb
28	HxCDF-All Hexachlorodibenzofurans	1 ppb
29	PeCdd-All Pentachlorodibenzo-p-dioxins	1 ppb
30	PeCDF-All Pentachlorodibenzofurans	1 ppb
31	TCDD-All Tetrachlorodibenzo-p-dioxins	1 ppb
32	TCDF-All Tetrachlorodibenzofurans	1 ppb
33	2.4.5-Trichlorophenol	0.05 ppm
34	2.4.6-Trichlorophenol	0.05 ppm
35	2.3.4.6-Tetrachlorophenol	0.10 ppm
36	Pentachlorophenol	0.01 ppm

(Continued on following pages)

HAZARDOUS WASTE MANIFEST

Department of the Environment
Hazardous & Solid Waste Management Administration
P.O. Box 13387 Baltimore, MD 21203

Hazardous Waste Division

IPP
cc Expires 9-30-91

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No.2050-0039 Expires 9/30/88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. P A D 0 0 2 2 8 2 0 0 2 — Manifest Document No. 0 0 5 5 0

2. Page 1 of 2 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Larry Domingas
215/698-4150
4. Generator's Phone ( )
International Paper
2100 E. Byberry Rd.
Philadelphia, PA 19116

A. State Manifest Document Number MDC 0194555

B. State Generator's ID

C. State Transporter's ID HWH 015 [illegible] DC 5718

5. Transporter 1 Company Name
GSX Services, Inc.

6. US EPA ID Number M D D 9 8 0 5 5 4 6 5 3

D. Transporter's Phone 301/953-9583

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID HWH DC

9. Designated Facility Name and Site Address
GSX Services, Inc.
3527 Whiskey Bottom Road
Laurel, MD 20707

10. US EPA ID Number M D D 9 8 0 5 5 4 6 5 3

F. Transporter's Phone

G. State Facility ID A207

H. Facility's Phone 3 0 1 - 9 5 3 - 9 5 8 3

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
HM						
a. X	WASTE FLAMMABLE LIQUID, NOS FLAMMABLE LIQUID UN1993 [RQ D001]	013	DM	05200	P	D001
b. X	WASTE COMBUSTIBLE LIQUID, NOS COMBUSTIBLE LIQUID NA1993 [RQD001]	005	DM	02000	P	D001
c. X	WASTE FLAMMABLE LIQUID NOS FLAMMABLE LIQUID UN1993	011	DF	00900	P	D001
d. X	WASTE METHYL ALCOHOL FLAMMABLE LIQUID UN1230	002	DM	00060	P	U154

J. Additional Descriptions for Materials Listed Above

	Haz. Code	Physical State	Specific Gravity	Percentage
a.	I	SL	1.2	100
b.	I	SL	1.1	100
c.	I	SL	1.1	100
d.	T	L	1.0	100

K. Handling Codes for Wastes Listed Above
a. S c. S
b. S d. S

I. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Maryland Statutes or Regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: Dennis Hughes — Signature: Dennis Hughes — Month Day Year: 05-19-89

17. Transporter 1 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name: JAMES E. SPARROW — Signature: James E. Sparrow — Month Day Year: 05 09 89

18. Transporter 2 Acknowledgement of Receipt of Materials — Date

Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

(Rev. 9-88) Previous editions are obsolete.

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name — Date

MDC 0194555

Department of the Environment
Waste Management Administration • Hazardous Waste Division
P.O. Box 13387 • Baltimore, Maryland 21203

Expires 09-01-91

...or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No. | Manifest Document No.: MAD992183492 | 00551

22. Page: 2 of 2

Information in the shaded areas is not required by Federal law.

23. Generator's Name: LAURENCE, MA 21076-9115
INTERNATIONAL PAPER
2100 C AVERY RD
PHILADELPHIA, PA 17116

L. State Manifest Document Number MDC: 017455

M. State Generator's ID:

N. State Transporter's ID: HWH 913 DC 5749

24. Transporter 1 Company Name: GSX SERVICES INC.

25. US EPA ID Number: MDD980954653

O. Transporter's Phone: 301/795-1785

26. Transporter ___ Company Name:

27. US EPA ID Number:

P. State Transporter's ID: HWH ___ DC ___

Q. Transporter's Phone:

	28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	29. Containers No.	29. Containers Type	30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
a.	NON-REGULATED MATERIAL	002	DM	00060	P	NONE
b. X	ALKALINE LIQUID, NOS CORROSIVE MATERIAL NA1719	001	DF	00020	P	NONE
c.	NON REGULATED MATERIAL	002	DF	00120	P	NONE
d.						
e.						
f.						
g.						
h.						
i.						

S. Additional Descriptions for Materials Listed Above

	Haz. Code	Physical State	Specific Gravity	Percentage
a.		S	1.1	100
b.		L	1.0	100
c.		L	1.2	100
d.				
e.				
f.				
g.				
h.				
i.				

T. Handling Codes for Wastes Listed Above

a.	5	f.	
b.	5	g.	
c.	5	h.	
d.		i.	
e.			

12. Special Handling Instructions and Additional Information

13. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: JAMES L PARROW

Signature:

Date: Month 05 Day 09 Year 91

14. Transporter ___ Acknowledgement of Receipt of Materials

Printed/Typed Name:

Signature:

Date: Month ___ Day ___ Year ___

15. Discrepancy Indication Space

Continuation Sheet
Sheet ___ of ___ Sheets

Generator Name/Location: International Paper Philadelphia, PA

EPA ID Number: PAD 002282002 Manifest Number: MDC 0194555/00550

Drum Number, Waste Profile or ARF Number	Category No.	State EPA Waste Number(s)	Corresponding Treatment Standard/ Applicable Variance/Other Information
28	1	D001	—
29	1	D001	—
30	1	D001	—
31	1	D001	—
32	1	D001	—
33	1	D001	—
34	1	D001	—
35	1	D001	—
36	1	D001	—

SIGNATURE: Dennis Hughes DATE: 5.9.89

PRINT NAME: Dennis Hughes TITLE: Production Manager

ONLY ORIGINAL SIGNATURES WILL BE ACCEPTED!

0194555

GSX

Sheet 1 of

Generator Name/Location: International Paper Philadelphia, PA

EPA ID Number: PAD 002282002 Manifest Number: MDC 0194555/00550

Drum Number, Waste Profile or ARF Number	Category No.	State EPA Waste Number(s)	Corresponding Treatment Standard/ Applicable Variance/Other Information
01-11	1	D001	—
12-16	1	D001	—
17	2A	F005, D001	1-26
18	1	D001	—
19	1	D001	—
20,21	2B, 5B	U154	U154 1ST THIRD LIST
22,23	1	—	—
24	1	—	—
25	1	—	—
26	1	—	—
27	1	D001	—

SIGNATURE: Dennis Hughes DATE: 5.9.89

PRINT NAME: Dennis Hughes TITLE: Production Manager

ONLY ORIGINAL SIGNATURES WILL BE ACCEPTED! September 23, 1988

For Treatment Standards Expressed as Concentration, Please Enter the Legend Number from the Legend Below for the Constituents contained in the Waste.

LEGEND FOR TREATMENT STANDARDS EXPRESSED AS CONCENTRATION

APPLICABLE CCWE-CONSTITUENTS IN WASTE EXTRACT

Legend #	Constituent Name	F001-F005 spent solvents Concentration in mg/l Aqueous Waste Containing Spent Solvents	F001-F005 spent solvents Concentration in mg/kg All other Spent Solvent Wastes
1	Acetone	0.05	0.59
2	n-Butyl alcohol	5.0	5.0
3	Carbon disulfide	1.05	4.81
4	Carbon tetrachloride	.05	.96
5	Chlorobenzene	.15	.05
6	Cresols (and cresylic acid)	2.82	.75
7	Cyclohexanone	.125	.75
8	1,2-dichlorobenzene	.65	.125
9	Ethyl acetate	.05	.75
10	Ethyl benzene	.10	.053
11	Ethyl ether	.05	.75
12	Isobutanol	5.0	5.0
13	Methanol	.25	.75
14	Methylene chloride	.20	.96
15	Methylene chloride (from the pharmaceutical industry)	12.7	.96
16	Methyl ethyl ketone	0.05	0.75
17	Methyl isobutyl ketone	0.05	0.33
18	Nitrobenzene	0.66	0.125
19	Pyridine	1.12	0.33
20	Tetrachloroethylene	0.079	0.05
21	Toluene	1.12	0.33
22	1,1,1-Trichloroethane	1.05	0.41
23	1,2,2-trichloro-1,2,2-trifluoroethane	1.05	0.96

Legend #	F020-F023 and F026-F028 dioxin Containing Waste Constituent Name	Concentration
27	HxCCD-All Hexachlorodibenzo-p-dioxins	1 ppb
28	HxCDF-All Hexachlorodibenzofurans	1 ppb
29	PeCdd-All Pentachlorodibenzo-p-dioxins	1 ppb
30	PeCDF-All Pentachlorodibenzofurans	1 ppb
31	TCDD-All Tetrachlorodibenzo-p-dioxins	1 ppb
32	TCDF-All Tetrachlorodibenzofurans	1 ppb
33	2,4,5-Trichlorophenol	0.05 ppm
34	2,4,6-Trichlorophenol	0.05 ppm
35	2,3,4,6-Tetrachlorophenol	0.10 ppm
36	Pentachlorophenol	0.01 ppm

(Continued on following pages)

GSX

CUSTOMER NOTIFICATION AND CERTIFICATION

Generator Name/Location: International Paper Philadelphia, PA

EPA ID Number: PAD 002282002

Waste Profile or ARF Number: _____

Manifest Number: MDC 019555/00550

EPA Hazardous Waste Number(s): (_____) (_____)

Waste Analysis Available? Yes _____ No _____ If yes, please attach copy.

X Unrestricted Waste Notification (Category 1)

I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste is not restricted as specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d).

X Restricted Waste Notification (Category 2)

I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 40 CFR 268, Subpart D.

X (2A) Waste must be treated by the appropriate regulatory treatment standard or in such a manner which renders it non-liquid by chemical fixation or solidification prior to land disposal. Corresponding treatment standard _____

X (2B) Waste is subject to 40 CFR 268.7(a)(4) and landfilling or placing in a surface impoundment is not allowed unless conditions of category 5 below are met.

_____ Restricted Waste Variance Certification/Notification (Category 3)

I notify pursuant to 40 CFR 268.7(a)(3) and certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268, Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Applicable Variance: _____

_____ Treated Waste Certification (Category 4)

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268, Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

X Soft Hammer Waste Certification (Category 5)

—(5A) I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

X (5B) I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

—(5C) I certify under penalty of law that I have personally examined and am familiar with the treament technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE: Dennis Hughes DATE: 5-9-89

PRINT NAME: Dennis Hughes TITLE: Products Manager

Regional Administrator
U.S. EPA - Region III
841 Chestnut Street
Philadelphia, PA 19107

Dear Regional Administrator:

As a generator of lab pack quantities (less than 5 gallon containers) of the following indicated waste streams and pursuant to the requirements of 40 CFR 268.7, this letter is to demonstrate to the Agency that I have contracted with GSX to use practically available technology that has been identified as achieving the greatest environmental benefit. The technology chosen for the following checked wastes is incineration as it provides for the most efficient destruction of the hazardous constituent and causes the greatest decrease in volume possible.

____P001 - Warfarin > .3%
____P005 - Allyl alcohol
____P018 - Brucine
____P020 - Dinoseb
____P030 - Soluble cyanide salts
____P039 - Disulfoton
____P041 - Diethyl-p-nitrophenyl phosphate
____P068 - Methyl Hydrazine
____P069 - Methyllactonitrile
____P070 - Aldicarb
____P071 - Methyl parathion
____P082 - N-Nitrosodimethylamine
____P084 - N-Nitrosomethylvinylamine
____P089 - Parathion
____P094 - Phorate
____P097 - Famphur
____P102 - Propargyl alcohol
____P108 - Strychnine and salts
____P110 - Tetraethyl lead
____P122 - Zinc phosphide > 10%
____U007 - Acrylamide
____U009 - Acrylonitrile
____U010 - Mitomycin C
____U012 - Aniline
____U016 - Benz(c)acridine
____U018 - Benz(a)anthracene
____U019 - Benzene
____U022 - Benzo(a)pyrene
____U031 - n-Butanol
____U050 - Creosote
____U053 - Crotonaldehyde
____U063 - Dibenz o (a,b) anthracene
____U064 - 2,2,7,8 Dibenzopyrene
____U068 - N,N Diethylhydrazine
____U089 - Diethylstilbestrol
____U103 - Dimethyl sulfate
____U105 - 2,4-Dinitrotoluene
____U108 - Dioxane 1,4
____U115 - Ethylene oxide
____U122 - Formaldehyde
____U124 - Furan
____U134 - Hydrofluoric acid
____U137 - Indeno (1,2,3-cd)pyrene
__X__U154 - Methanol
____U155 - Methapyrilene
____U157 - 3-Methylcholanthrene
____U159 - Methyl ethyl ketone
____U171 - 2-Nitropropane
____U177 - N-Nitroso-N-methylurea
____U180 - N-Nitrosopyrolidine
____U188 - Phenol
____U200 - Reserpine
____U219 - Thiourea
____U220 - Toluene
____U221 - Toluenediamine
____U223 - Toluene diisocyanate
____U238 - Ethyl carbamate
____U248 - Warfarin < .3%
____U249 - Zinc phosphide < 10%

Treatment by hydrolysis has been selected for the following compounds. These wastes are fairly reactive and hydrolysis provides the most contolled destruction of these wastes.

____P010 - Arsenic acid
____P011 - Arsenic (V) oxide
____P012 - Arsenic (III) oxide
____P122 - Zinc phosphide 10%
____U133 - Hydrazine

Other facilities contacted were:

Bethlehem Apparatus
890 Front Street
P.O. Box Y
Hellertown, PA 18055
Bruce Lawrence (215) 838-7034

(This facility was contacted February 13, 1989. They are a mercury recycler who can not handle any soft hammer wastes.)

CyanoKEM
12381 Schaefer Highway
Detroit, MI 48227
Mary Humphreys (313) 353-5880

(This facility was contacted on February 16, 1989. They do not handle lab-packs.)

I certify under penalty of law that the requirements of 40 CFR 268.8 (a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature: Dennis Hughes
Print Name: Dennis Hughes
Title: Production Manager
Date: 5-9-89

Generator: INTERNATIONAL PAPER
EPA ID#: PAD 002 28 2002
ADDRESS: 2100 E. BYBERRY RD.
PHILADELPHIA, PA 19116

EPA REGIONS

REGION I

Regional Administrator
U.S. EPA
John F. Kennedy Federal Building
Boston, MA 02203

(CT, RI, MA, NH, VT, ME)

REGION II

Regional Administrator
U.S. EPA
26 Federal Plaza
New York, NY 10278

(NY, NJ)

REGION III

Regional Administrator
U.S. EPA
841 Chestnut Street
Philadelphia, PA 19107

(PA, MD, DE, WV, Washington, D.C., VA)

REGION IV

Regional Administrator
345 Courtland Street, NE
Atlanta, GA 30365

(NC, SC, GA, FL, AL, MS, KY, TN)

REGION V

Regional Administrator
U.S. EPA
230 South Dearborn Street
Chicago, IL 60604

(OH, IN, IL, MI, WI)